

**REMARKS**

Claims 1-15 are pending in this application. By this Amendment, claims 1 and 3 are amended solely to correct minor informalities contained therein. No new matter is added. Reconsideration of the application is respectfully requested.

Entry of the Amendment is proper under 37 CFR §1.116 because the Amendment: (a) places the application in condition for allowance for the reasons discussed herein; (b) does not raise any new issues requiring further search and/or consideration as the amendments amplify issues previously discussed throughout prosecution; (c) do not present any additional claims without canceling a corresponding number of finally rejected claims; and (d) places the application in better form for appeal, should an appeal be necessary. The amendments are necessary and were not earlier presented because they are made to correct newly discovered informalities in claims 1 and 3. Entry of the amendments is thus respectfully requested.

Claims 2, 5, 8 and 11 are rejected under 35 U.S.C. §102(b) over the related art discussed in the "Background of the Invention" section of the specification ("Related Art").

The paragraph abridging pages 2 and 3 of the Office Action states that K, as disclosed on page 1 of Applicants' specification corresponds to "a chosen scale factor", as recited in claim 2. Applicants respectfully disagree.

Claim 2 recites "applying a chosen scale factor to remainders of integer divisions, the remainders being a result of calculating the output values of the previous samples". Applicants respectfully submit that all the characteristics of the chosen scale factor, as recited in claim 2, must be considered.

Applicants' specification discloses that "K" designates a coefficient enabling the filter gain to be regulated (page 1, line 21). In addition, K is not applied to remainders of integer divisions resulting from the output values of previous samples.

Page 2 of the Office Action states that the transfer function  $F(Z)$ , which is provided on page 1 of Applicants' specification, is used to calculate an output signal of sample  $n$  and as shown on page 1 of Applicants' specification, the alleged scale factor  $K$  is part of the transfer function itself. Thus, the alleged scale factor  $K$  is part of the transfer function, and is not applied to remainders of integer divisions that result from calculating output values of previous samples.

For at least these reasons, Applicants submit that the Related Art fails to disclose or suggest all the features of claim 2 including, *inter alia*, applying a chosen scale factor to remainders of integer divisions, the remainders being a result of calculating the output values of the previous samples. Thus, the Related Art fails to disclose or suggest all the features of claim 2, as well as all the features of claims 5, 8 and 11, which depend from claim 2. It is respectfully requested that the rejection be withdrawn.

Claims 1, 3, 4, 6, 7, 9, 10 and 12 are rejected under 35 U.S.C. §103(a) over the Related Art in view of U.S. Patent No. 6,216,145 to Zandi et al. ("Zandi"). The rejection is respectfully traversed for at least the following reasons.

With regard to claim 1, page 4 of the Office Action also states that  $K$ , as disclosed on page 1 of Applicants' specification corresponds to the chosen scale factor recited in claim 1. As discussed above, however,  $K$  is not applied to remainders of integer divisions, the remainders being a result of calculating the output values of the previous samples, as recited in claim 1.

Further, with regard to claims 1 and 3, page 4 of the Office Action acknowledges that the Related Art fails to disclose changing a number obtained from rounding to a default integer value what is obtained from dividing the output value by the scale factor by a number obtained from rounding to a closest integer to the real-number quotient thereof. The Office Action states that Zandi overcomes these deficiencies in the Related Art. Applicants

respectfully disagree. Applicants also respectfully submit that every recited characteristic of the features recited in claims 1 and 3 must be considered, and claims 1 and 3 recite changing a number obtained from rounding ... based on a number obtained from rounding to a closest integer the output value by the scale factor.

Zandi discloses a round-to-integer block 604 that rounds the output of the function block 603 to the nearest integer (col. 19, lines 21-22). Zandi fails to disclose, *inter alia*, changing a number obtained from rounding to a default integer value what is obtained from dividing the output value by a scale factor by a number obtained from rounding to a closest integer to the real-number quotient thereof, as recited in claims 1 and 3.

For at least these reasons, Applicants respectfully submit that the combination of the Related Art and Zandi fails to disclose or suggest all the features recited in claims 1 and 3, as well as all the features recited in claims 4, 6, 7, 9, 10 and 12, which respectively depend from claims 1 and 3. It is respectfully requested that the rejection be withdrawn.

Claims 13 and 15 are rejected under 35 U.S.C. §103(a) over the Related Art in view of Zandi and further in view of U.S. Patent No. 3,619,586 to Marcian et al. (Marcian). The rejection is respectfully traversed for at least the following reasons.

As discussed above with regard to claims 1 and 3, from which claims 13 and 15 depend, the combination of the Related Art and Zandi fails to disclose all the features of claims 1 and 3. Applicants respectfully submit that Marcian also fails to overcome the deficiencies of the combination of the Related Art and Zandi, as applied to claims 1 and 3. For at least these reasons, Applicants respectfully submit that the combination of the Related Art, Zandi and Marcian fails to disclose or suggest all the features of claims 13 and 15, which depend from claims 1 and 3. It is respectfully requested that the rejection be withdrawn.

Claim 14 is rejected under 35 U.S.C. §103(a) over the Related Art in view of Marcian. The rejection is respectfully traversed for at least the following reasons.

As discussed above with regard to claim 2, from which claim 14 depends, the Related Art fails to disclose all the features of claim 2. Applicants respectfully submit that Marcian also fails to overcome the deficiencies of the Related Art, as applied to claim 2. For at least these reasons, Applicants respectfully submit that the combination of the Related Art and Marcian fails to disclose or suggest all the features of claim 14, which depends from claim 2. It is respectfully requested that the rejection be withdrawn.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of all pending claims are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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